

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

**v.**

**No. 05-cr-1849 JH**

**MANUEL GIL,**

Defendant.

**MOTION TO CONTINUE SENTENCING**

**COMES NOW** the Defendant, MANUEL VELASQUEZ-GIL, by and through his attorneys, Timothy M. Padilla & Associates, P.C., by Timothy M. Padilla and respectfully motions this Court for an Order continuing the Sentencing in this matter currently set for February 3, 2011. As grounds therefore, counsel states:

1. The Defendant is not in custody, and has been in complete compliance with Pre-Trial Services Probation;
2. That the Pre-Sentence Report for the Defendant has not yet been completed, and the Defendant needs to further provide the Probation Officer with further documents;
3. That Counsel for the Defendant, upon receipt of the Pre-Sentence Report, will need additional time in which to review the report and respond, if necessary;
4. That Assistant U.S. Attorney, James Braun, has been contacted, and does not oppose the relief requested in this motion; and

5. That a form of Order will be electronically delivered to the Honorable Judith C. Herrera, via e-mail, [jchproposedtext@nmcourt.fed.us](mailto:jchproposedtext@nmcourt.fed.us) for approval.

**WHEREFORE** Counsel for the Defendant prays that this Court grant this Motion to Continue the Sentencing currently scheduled for February 3, 2011, and for any such other relief as the Court deems just and proper.

Respectfully submitted:

/s/ Timothy M. Padilla  
Timothy M. Padilla  
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**I HEREBY CERTIFY** that a true and correct copy of the foregoing pleading was filed and delivered electronically through the CM/ECF system to all parties entitled to notice, this 5<sup>th</sup> day of January, 2011.

/s/ Timothy M. Padilla  
Timothy M. Padilla